

STATEMENT OF BASIS (AI No. 24458)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0116092 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Port Ship Services, Inc.
Arabi Facility
7121 N. Peters St.
Arabi, Louisiana 70032

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: February 12, 2008

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: May 1, 2003
LPDES permit expiration date: April 30, 2008
EPA has not retained enforcement authority.

C. Date Application Received: November 1, 2007

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - water taxi facility**

The facility is primarily engaged in furnishing water transportation of passengers (e.g. ship's crew and pilot) and ship equipment.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 4489, 4449

C. LOCATION - 7121 N. Peters St. in Arabi, St. Bernard Parish
Latitude 29°56'47", Longitude 90°00'20"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated bilge water from company boats
 Treatment: oil/water separator
 Location: at the point of discharge from the oil/water separator
 (Latitude 29°56'47", Longitude 90°00'20")
 Flow: 50 gpd
 Discharge Route: Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES - a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife
 d. drinking water supply

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit: None

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

B. DMR Review/Excursions DMRs were reviewed from January 2006 to December 2007. There were no excursions.

7. EXISTING EFFLUENT LIMITS

Outfall 001 -
 COD 200:300
 Oil and Grease ---:15 mg/l
 pH 6-9

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8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated 10/24/07 from Boggs (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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12. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2341.B.14.h, "transportation facilities classified as SIC 40, 41, 42, 43, 44, 45, and 5171 which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations," need coverage for storm water discharge associated with industrial activity. An SWP3 is not included in the permit since there is no potential for storm water contamination from these processes.

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Rationale for Port Ship Services, Inc.

1. **Outfall 001** treated bilge water from company boats (estimated flow is 50gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow (GPD)	Report:Report	
COD	200:300 mg/l	BPJ; similar discharges
Oil & Grease	---:15 mg/l	BPJ; similar discharges
pH	6.0 - 9.0 su	BPJ; similar discharges

Treatment: oil/water separator

Monitoring Frequency: Monthly for all parameters. (BPJ; similar discharges)

Limits Justification: BPJ; similar discharges

* Existing permits for similar outfalls
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL Waterbodies

Subsegment 070301, Mississippi River From Monte Sano Bayou to Head of Passes, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.